



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 01-091

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]

5. Clarity, Grammar, Punctuation and Use of Plain Language

The analysis to the rule appears to indicate that a foreign graduate who applies for a pharmacist license in Wisconsin will be required to take and pass the foreign pharmacy graduate equivalency examination, the test of English as a foreign language and the test of spoken English. The rule does not specifically state that these three examinations must be taken and passed. Instead, the rule merely provides that such an applicant must obtain certification by the foreign pharmacy graduate examination committee. Does this committee routinely require that the three examinations be taken and passed? Are there other examinations that may be required or offered by the committee? For ultimately clarity, the tests anticipated by the Pharmacy Examining Board should be stated in the rule, unless certification by the foreign pharmacy graduate examination committee is all that is desired. If certification is the goal, it should be acknowledged that the committee might apply different tests in the future.